#### DOCKET SECTION

## BEFORE THE POSTAL RATE COMMISSION

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POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

### ANSWERS OF UNITED PARCEL SERVICE WITNESS STEPHEN E. SELLICK TO INTERROGATORY OF THE DIRECT MARKETING ASSOCIATION, INC. (DMA/UPS-T2-6)

(February 23, 1998)

Pursuant to the Commission's Rules of Practice, United Parcel Service ("UPS") hereby serves and files the responses of UPS witness Stephen E. Sellick to interrogatory DMA/UPS-T2-6 of the Direct Marketing Association, Inc.

Respectfully submitted,

John E. McKeever Daniel J. Carrigan

Attorneys for United Parcel Service

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Of Counsel.

# ANSWER OF UNITED PARCEL SERVICE WITNESS SELLICK TO INTERROGATORY OF THE DIRECT MARKETING ASSOCIATION, INC.

DMA/UPS-T2-6. Please refer to your response to DMA/UPS-T2-1(a) where you state that "[t]he importance of assumptions which underlie an analysis depends on the impact a change in the assumptions would have on the final results." Have you performed any quantitative or statistical analysis concerning the impact that a change in any one of witness Degen's assumptions (referenced in DMA/UPS-T2-1) would have on the "final results" of Mr. Degen's mail processing cost distributions? If so, please summarize the results of your analysis and provide a copy of any report detailing your analysis.

Response to DMA/UPS-T2-6. No.

### **DECLARATION**

I, Stephen E. Sellick, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Stephen E. Sellick

Dated: February 23, 1998

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

John E. McKeever

Dated: February 23, 1998

Philadelphia, PA